

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

REMBRANDT TECHNOLOGIES, LP,

Plaintiff(s),

v.

COMCAST CORPORATION, COMCAST
CABLE COMMUNICATIONS, LLC, and
COMCAST OF PLANO, LP,

Defendant(s).

Case No. 2:05-CV-443-TJW

PLAINTIFF'S REPLY TO DEFENDANTS' COUNTERCLAIMS

Plaintiff Rembrandt Technologies, LP ("Rembrandt") hereby responds to the Counterclaims of Defendants Comcast Corporation ("Comcast Corp."), Comcast Cable Communications, LLC ("Comcast Cable"), and Comcast of Plano, LP ("Comcast of Plano") (collectively "Comcast") as follows. All allegations not expressly admitted are denied.

1. Rembrandt admits that Comcast Corp. is a corporation incorporated under the laws of Pennsylvania, having its principal place of business at 1500 Market Street, Philadelphia, Pennsylvania. Rembrandt admits that Comcast Cable is a corporation incorporated under the laws of Delaware having its principal place of business at 1500 Market Street, Philadelphia, Pennsylvania. Rembrandt admits that Comcast of Plano, LP is a limited partnership organized under the laws of Delaware. Rembrandt is without sufficient information to form a belief as to the truth of the remaining allegations in this paragraph.

2. Admitted.

3. Rembrandt admits that this Court has jurisdiction over Comcast's Counterclaims. The remaining allegations of this paragraph do not require a response.

4. Admitted.

5. Rembrandt admits that venue in this district is proper with respect to Comcast's Counterclaims.

FIRST COUNTERCLAIM FOR RELIEF

6. Rembrandt incorporates by reference its responses contained in Paragraphs 1 through 5 above.

7. Rembrandt admits that an actual controversy exists between the parties regarding U.S. Patent No. 5,243,627.

8. Paragraphs 1-30 of Comcast's Answer do not require a response. Rembrandt denies all allegations contained in Comcast's Affirmative Defenses.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

SECOND COUNTERCLAIM FOR RELIEF

14. Rembrandt incorporates by reference its responses contained in Paragraphs 1 through 13 above.

15. Rembrandt admits that an actual controversy exists between the parties regarding U.S. Patent No. 5,852,631.

16. Paragraphs 1-30 of Comcast's Answer do not require a response. Rembrandt denies all allegations contained in Comcast's Affirmative Defenses.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

THIRD COUNTERCLAIM FOR RELIEF

22. Rembrandt incorporates by reference its responses contained in Paragraphs 1 through 21 above.

23. Rembrandt admits that an actual controversy exists between the parties regarding U.S. Patent No. 5,719,858).

24. Paragraphs 1-30 of Comcast's Answer do not require a response. Rembrandt denies all allegations contained in Comcast's Affirmative Defenses.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Denied.

FOURTH COUNTERCLAIM FOR RELIEF

30. Rembrandt incorporates by reference its responses contained in Paragraphs 1 through 29 above.

31. Rembrandt admits that an actual controversy exists between the parties regarding U.S. Patent No. 4,937,819.

32. Paragraphs 1-30 of Comcast's Answer do not require a response. Rembrandt denies all allegations contained in Comcast's Affirmative Defenses.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

JURY DEMAND

This paragraph does not require a response.

PRAYER FOR RELIEF

Rembrandt denies that Comcast is entitled to any relief.

Dated: December 7, 2005

Respectfully submitted,

By: /s/ Otis W. Carroll by permission S. Calvin Capshaw

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CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record who are deemed to have consented to electronic service are being served this 7th day of December, 2005, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by, electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ S. Calvin Capshaw

S. Calvin Capshaw